

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #: \_\_\_\_\_  
DATE FILED: 07/09/2020

**DAVID K. BERTAN**  
ATTORNEY AT LAW  
**888 GRAND CONCOURSE, SUITE 1N**  
**BRONX, NEW YORK 10451**

(718) 742-1688  
FAX (718) 585-8640  
E-MAIL: DBERTAN@YAHOO.COM

## **MEMO ENDORSED**

July 9, 2020

**Via ECF**

Hon. Valerie E. Caproni, United States District Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

Re: USA v. Kareem Lanier  
Docket No. 15-cr-537 (VEC)

Dear Judge Caproni:

I am the CJA attorney assigned to represent Mr. Lanier and am writing to respectfully request an extension of time in which to file supplemental motions on Mr. Lanier's behalf.

On June 5, 2020, Your Honor issued an order requesting CJA assign an attorney to represent Mr. Lanier, and issued an order setting a schedule for supplemental papers. Under that schedule, supplemental papers on Mr. Lanier's behalf are due by July 17, 2020.

I have reviewed the docket, the plea and sentencing minutes, and the relevant indictment in this case. I have also written to Mr. Lanier, advising him I have been assigned to represent him, and am awaiting his response so we can jointly decide how to proceed further.

Accordingly, I am asking for an extension of time to August 21, 2020 in which to file my supplemental motion. Thank you for your consideration in this matter.

Very truly yours,  
-S-  
David K. Bertan, Esq.

cc: AUSA Gina Castellano (via ECF)

Application GRANTED. Mr. Lanier's motion is due by **August 21, 2020**; the Government's response is due by **September 11, 2020**; Mr. Lanier's reply is due by **September 25, 2020**.

SO ORDERED.

Date: 07/09/2020



HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE